

EXHIBIT A

Strickland v. United States, et al (No.1:20cv66 W.D.N.C.)
Exhibit Objections (Ex. A)

Ex. No.	Bates Number	Date	Description of Exhibits	Objection(s)
1	US00004020-4021	Feb. 27, 2018	Emails between J.P. Davis and Caryn Strickland	Cond.; 106; 402; 403; 801/802; F
2	US00005731-5733	June 14, 2018	Emails between Caryn Strickland and J.P. Davis	Cond.; 402; 403; 801/802; F; potentially privileged
3	US00000089	May 18, 2018	Email from J.P. Davis to Caryn Strickland	Cond; 106 (does not include entire document); 801/802
4	US00000090	June 1, 2018	Emails between Caryn Strickland and J.P. Davis	Cond; 106 (does not include entire document); 801/802
5	US00000091	June 19, 2018	Emails between J.P. Davis and Caryn Strickland	Cond.; 106 (does not include entire document); 801/802
6	US00000092	June 21, 2018	Texts between J.P. Davis and Caryn Strickland	Cond.; 106 (does not include entire document); 801/802
7	US00000093	June 27, 2018	Emails between Caryn Strickland and J.P. Davis	Cond.; 106 (does not include entire document); 801/802; F
8	US00006636	July 24, 2018	Text message from Anthony Martinez to J.P. Davis	Cond.; 801/802; 901; F
9	US00004536-64	Nov. 2018	Consolidated Equal Employment Opportunity & Employment Dispute Resolution Plan	None
10	US00000615-0618	Aug. 14, 2018	Email from James Ishida to Lisa Morris	Cond.; 801/802; 901; F
11	US00000974-79	Aug. 9, 2018	Emails between Caryn Strickland and Nancy Dunham	Cond.; 801/802; F
12	US00000565	Sept. 10, 2018	Email from Caryn Strickland to James Ishida	Cond.; 106 (attachments not included); 801/802
13	US00002816	Jan. 16, 2019	Letter from James Ishida to Caryn Strickland	Cond.; 106 (cover email not included); 801/802; F
14	US00001322-1324	Mar. 2019	Emails between James Ishida and Edward Smith	Cond.; 801/802; 901
15	US00003300	Mar. 11, 2019	Email from Caryn Strickland to James Ishida	Cond.; 403; F
16	US00001244-1257	January 11, 2019	Counselor's Report	Cond.; 106 (does not include attachments to report); 403; 602; 701; 801/802; 901; 1001-1004; E
17	PLTF002178-84	Nov. 26, 2018	Email from Caryn Strickland to Amaal Scroggins	Cond.; 403; 801/802; 1001-1004; F; UT
18	US00002891-2926	October 2017 to June 2018	Text messages between J.P. Davis and Caryn Strickland	Cond.; 402; 403; 801/802; F; potentially privileged

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19	US00006403	June 6, 2018	Email from Caryn Strickland to J.P. Davis	Cond.; 402; 403; 801/802; F
20	US00006405-6406	June 18, 2018	Email from Caryn Strickland to J.P. Davis	Cond.; 402; 403; 801/802; F; potentially privileged
21	US00001074-1078	Aug. 6, 2019	Email from Caryn Strickland to Nancy Dunham	Cond.; 106 (does not include attachments referenced in email chain); F
22	US00003380-3383	Jan. 2019	Emails from Caryn Strickland to James Ishida	Cond.; 106 (does not include attachment); 403; 801/802; F
23	US00001402-1406	Sept. 2018	Emails between James Ishida and Caryn Strickland	Cond.; 106 (does not include attachments); 403; 801/802; F
24	US00005361-5363	Aug. 15, 2018	Email from Heather Beam to James Ishida	Cond.; 801/802; 901; F
25	US00000307-0308	Jan. 31, 2019	Email from James Ishida to Edward Smith	Cond.; 106 (does not include attachment); 801/802; 901; F
26	US00000467	Sept. 10, 2018	Request for Disqualification and a Stay of the Prior Investigation	Cond.; 106 (does not include cover email)
27	US00000391-0392	Oct. 12, 2018	Email from Heather Beam to Anthony Martinez	Cond.; 801/802; 901; F
28	US00000616-0618	Aug. 14, 2018	Email from James Ishida to Anthony Martinez	Cond.; 106 (does not include full email chain); 403; 801/802; 901; F
29	US00002568	Aug. 15, 2018	Email from James Ishida to Roger Gregory	Cond.; 106; 403; 801/802; 901; F
30	US00001421-1423	Aug. 17, 2018	Email from James Ishida to Heather Beam	Cond.; 403; 801/802; 901; F
31	US00002300-2301	Nov. 21, 2018	Email from Caryn Strickland to James Ishida	Cond.; 106 (does not include full email chain); 801/802; F
32	PLTF0004450	Nov. 19, 2018	Text message from Caryn Strickland to Laura Minor	Cond.; 106; 403; 801/802; F
33	US00000405	Jan. 11, 2019	Email from James Ishida to Heather Beam	Cond.; 106 (does not include attachment); 602; 701; 801/802; 901; E; F
34	PLTF004499	Feb. 15, 2019	Text message from Caryn Strickland to Valerie Nannery	Cond.; 106; 403; 801/802; F
36	US00004264-4267	May 28, 2019	Letter from James Ishida to Anthony Martinez	Cond.; 106 (does not include cover email); 403; 602; 701; 801/802; E
37	PLTF004356-58	Jan. 11, 2019	Emails between Joshua Carpenter and Caryn Strickland	Cond.; 403; 404/405, 608/609; 801/802; UT; F

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38	US00001499-1502	Feb. 24, 2019	Renewed Request for Disqualification	Cond.; 106 (does not include cover email)
39	US00001505-1508	Jan. 31, 2018 thru Feb. 1, 2019	Emails between James Ishida and Caryn Strickland	Cond.; 106 (does not include attachment); 801/802; F
40	US00000303	Jan. 31, 2019	Email from James Ishida to Caryn Strickland	Cond.; 106 (does not include attachment); 801/802
41	US00001634-1639	Nov. 28, 2019 approx.	Emails between Caryn Strickland and James Ishida (June 12, 2019) [email migrated]	Cond.; 602; 801/802; F
42	US00002517-2518	Sept. 6, 2018	Email from James Ishida to Caryn Strickland	Cond.; 801/802; F
43	PLTF002330-2335	Jan. 4, 2019	Emails between James Ishida and Caryn Strickland	Cond.; 801/802; 1001-1004; F; UT
44	PLTF002187-2189	Nov. 26, 2018	Email from James Ishida to Caryn Strickland	Cond.; 801/802; 1001-1004; F; UT
45	US00002508-2512	Sept. 10, 2018	Letter from Caryn Strickland to James Ishida	Cond.; 106 (cover email and request for counseling not included)
46	US00002523-2524	Aug. 21, 2018	Email from Anthony Martinez to James Ishida	Cond.; 602; 801/802; 901; F
47	US00002714-2715	Aug. 28, 2018	Email from Valerie Farr to William Moorman	Cond.; 106 (does not include full email chain); 403; 602; 801/802; 901; 1001-1004; F
48	US00002767-2770	Oct. 2, 2018	Telework Agreement for Caryn Strickland	Cond.; 106 (cover email not included); 402; 403; 801/802; F; PI home address not redacted
49	US00002786-2787	26-Jul-18	Email from Anthony Martinez to AllStaff@fd.org	Cond.; 106 (attachment not included); 801/802; 1001-1004; F
50	US00002788-2789	July 25, 2018	Position Announcement	Cond.; 106 (cover email not included); 901; F
51	US00002803-2808	Jan. 11, 2019	Email from Joshua Carpenter to Heather Beam	Cond.; 403; 602; 801/802; 901; F; potentially privileged
52	US00002809	July 24, 2018	Email from Joshua Carpenter to Anthony Martinez	Cond.; 403; 602; 801/802; 901; F
53	US00002810-2812	July 23, 2018	Email from Joshua Carpenter to Holly Dixon	Cond.; 106 (does not include attachment); 403; 602; 701; 801/802; 901; F

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Ex. No.	Bates Number	Date	Description of Exhibits	Objection(s)
54	US00002818-2819	Sept. 10, 2019	Request for Counseling	Cond.; 106 (cover email not included); 403; 801/802; 1001-1004 (does not include version of document from Investigator file); F
55	US00002834-2838	May 15, 2018 to Aug. 10, 2018	Timeline	Cond.; 106 (does not include cover email); 403; 602; 701; 801/802; 901; 1001-1004; F; potentially privileged
56	US00002844	August 20, 2018	Email from J.P. Davis to Anthony Martinez	Cond.; 106 (does not include attachment); 403; 602; 701; 801/802; 901; 1001-1004; F; potentially privileged
57	US00002866-2867	Aug. 14, 2018	Email from James Ishida to Anthony Martinez	Cond.; 701; 801/802; 901; F
58	US00002870	Mar. 24, 2017	Offer Letter for Attorney Position from Ross Richardson	Cond.; 106 (cover email not included); PI home address not redacted
59	US00002871-2890	Mar. 18, 2019	Form SF50 - Notification of Personnel Action of Caryn Strickland	Cond.; 402; 403; 801/802; 901; 1001-1004; F; PI social security number, date of birth, home address not redacted
60	US00003037	Dec. 5, 2017	Email from Caryn Strickland to J.P. Davis	Cond.; 402; 403; F
61	US00003380-3383	Jan. 28, 2019	Email from Caryn Strickland to James Ishida	Cond.; 106 (does not include attachment); F
62	US00003431	Aug. 3, 2018	Employee Manual Receipt	Cond.; 602; 801/802; F
63	US00003454-3455	Aug. 20, 2018	Form AO52 - Request for Personnel Action of Caryn Strickland (effective date)	Cond; 106; 402; 403; 801/802; 901; 1001-1004; F (form is not signed or the version that was submitted); PL social security number, date of birth, home address not redacted
64	US00003971	July 8, 2018	Email from J.P. Davis to W. Kelly Johnson	Cond.; 403; 801/802; 901; F
65	US00003980-3981	July 9, 2018	Email from Anthony Martinez to Caryn Strickland	Cond.; 801/802
66	US00003982-3984	June 6, 2018	Email from J.P. Davis to Caryn Strickland	Cond; 403; 701; 801/802; potentially privileged

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67	US00003985	July 5, 2018	Significant Event Log	Cond.; 602; 801/802; 901; potentially privileged
68	US00004004-4006	Mar. 11, 2019	Email from Delani Farrar to Caryn Strickland	Cond.; 402; 801/802; 901; F
69	US00004014-4015	Oct. 11, 2018	Email from J.P. Davis to Heather Beam	Cond.; 106 (attachment not included); 701; 801/802; 901; F
70	US00004078-4080		Caryn Strickland Employment Timeline	Cond.; 106 (cover email and attachment not included); 403; 602; 701; 801/802; 901 (US4080 appears to be an altered version of original document); 1001-1004; F
71	US00004148-4149	Feb. 11, 2019	Email from William Moormann to Anthony Martinez	Cond.; 403; 602; 701; 801/802; 901; 1001-1004; F
72	US00004155-4162	July 26, 2018	Email from Anthony Martinez to Joshua Carpenter	Cond.; 106 (does not include attachment); 403; 602; 701; 801/802; 901; 1001-1004; F
73	US00004261-4262	Aug. 18, 2018	Email from Anthony Martinez to Caryn Strickland	Cond.; 601; 403; 801/802; 901 (email is altered/inauthentic); 1001-1004; F
74	US00004565	Mar. 9, 2018	Text messages between J.P. Davis and Caryn Strickland	Cond.; 402; 403; 801/802; F
75	US00004575-4576	June 7, 2018	Email from J.P. Davis to Anthony Martinez	Cond; 403; 602; 701; 801/802; 901; F; potentially privileged
76	US00004584-4585	July 2, 2018	Email from J.P. Davis to himself	Cond; 403; 602; 801/802; 901; 1001-1004; F; potentially privileged
77	US00004586	July 22, 2018	Email from J.P. Davis to Caryn Strickland	Cond; 801/802
78	US00004587	Dec. 5, 2017	Email from Caryn Strickland to Anthony Martinez	Cond.; 402
79	US00004704-4705	May - July 2018	May 2018 - July 2018 Calendar	Cond; 403; 404/405; 602; 608/609; 611; 701; 801/802; 901; 1001-1004; F; potentially privileged
80	US00004706-07		New Attorney Shadowing Checklist	Cond.; 402; 403; 901; F; 1001-1004
81	US00004719	Aug. 22, 2017	Email from Caryn Strickland to J.P. Davis	Cond.; 106 (does not include attachment); 403; F

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82	US00004880	Aug. 20, 2018	Emails between Jared Martin to Anthony Martinez	Cond.; 801/802; 901; F
83	US00004885	Jan. 11, 2019	Email from Joshua Carpenter to Anthony Martinez	Cond.; 403; 602; 801/802; 901; F; potentially privileged
84	US00004887-4888	Aug. 20, 2018	Emails between Caryn Strickland and Anthony Martinez	Cond; 402; 403; 801/802; F; potentially privileged
85	US00004889-04890	Oct. 15, 2018	Emails between Caryn Strickland and Anthony Martinez	Cond; 402; 801/802; F
86	US00005346-5349	Mar. 11, 2019	Emails between Delani Farrar and Caryn Strickland	Cond.; 402; 602; 701; 801/802; 901; F
87	US00005353-5358	Feb. 22, 2019	Caryn Strickland's Federal Judicial Branch Application for Employment	Cond.; 402; 801/802; F; PI home address unredacted
88	US00005390-5392	Mar. 11, 2019	Emails between Caryn Strickland and Jill Langley	Cond.; 701; 801/802
89	US00005529-5532	Feb. 14, 2019	Handwritten notes from call with James Ishida and Ed Smith	Cond.; 403; 602; 701; 801/802; 901; F
90	US00005539-5540	Feb. 12, 2019	Handwritten notes from call with James Ishida and Ed Smith	Cond.; 403; 602; 801/802; 901; F
91	US00006252-6260	Oct. 9, 2018	Evidence guide from J.P. Davis to Heather Beam	Cond.; 106 (does not include "cheat sheet"); 402; 403; 404/405; 602; 608/609; 611; 701; 801/802; 901; 1001-1004; F; potentially privileged
92	US00006265-6276	Oct. 10, 2018	Short timeline written by J.P. Davis	Cond.; 403; 404/405; 602; 608/609; 611; 701; 801/802; 901; 1001-1004; F
93	US00006277	Sept. 9, 2018	Summary of meetings and meeting requests by J.P. Davis	Cond.; 106; 403; 801/802; 901; F; potentially privileged
94	US00006319-6320	Apr. 30, 2018	Text messages between Caryn Strickland and Anthony Martinez	Cond.; 403; 801/802; F
95	US00006331-6335	June 1, to Aug. 28, 2018	Caryn Strickland Time History Report	Cond.; 402; 403; 801/802; 901; F
96	US00006357-6358	June 6, 2018	Email from J.P. Davis to himself	Cond.; 403; 602; 701; 801/802; 901; F; potentially privileged
97	US00006360-6361	June 5, 2018	Text messages between J.P. Davis and Erin Taylor	Cond.; 106 (does not include complete text message chain); 403; 801/802; 901; F
98	US00006389-6392	June 6, 2018	Text messages between Phil L. and J.P. Davis	Cond; 403; 602; 701; 801/802; 901; F

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Ex. No.	Bates Number	Date	Description of Exhibits	Objection(s)
99	US00006395-6397	June 6, 2018	J.P. Davis's handwritten notes	Cond.; 403; 602; 701; 801/802; 901; F
100	US00006621-6627	June 26, 2018	Emails between Anthony Martinez and J.P. Davis	Cond.; 602; 701; 801/802; 901; F; potentially privileged
101	US00006631	July 2, 2018	J.P. Davis's handwritten notes	Cond.; 403; 602; 701; 801/802; 901; F
102	US00006740-6838		Caryn Strickland's I-9 and eOPF	Cond.; 402; 403; 801/802; 901; F; PI social security number, passport number, home addresses, birth date not redacted
103	US00006839-6843	Aug. 9, 2018 - May 8, 2019	Anthony Martinez's handwritten notes	Cond.; 403; 602; 801/802; 901; F
104	US00006847-6851	May 18, to Aug. 10, 2018	Caryn Strickland Time History Report	Cond.; 402; 403; 801/802; 901; F
105	US00006872-6877	May 15, to Aug. 10, 2018	J.P. Davis Time History Report	Cond. 402; 403; 801/802; 901; F
106	US00007413-7415	July 20, 2018	Team Leader Meeting Agenda	Cond.; 106; 602; 701; 801/802; 901; F
107	PLTF22-23	July 24, 2018	Caryn Strickland's handwritten notes	Cond.; 403; 404/405, 608/609; 801/802; F; 1001-1004, UT
108	PLTF688-692	June 6, 2018	Caryn Strickland's handwritten notes	Cond.; 403; 404/405, 608/609; 801/802; 1001-1004; F; UT
109	PLTF4646	Mar. 23, 2018	Text messages between Caryn Strickland and J.P. Davis	Cond.; 106; 403; 404/405, 608/609; 801/802; 1001-1004; F; UT
110	US00000064-0109	Feb. 22, 2019	Letter from Cooper Strickland to James Ishida	Cond.; 801/802
111	US00000202	Mar. 11, 2019	Email from James Ishida to Juval Scott	Cond.; 801/802; 901; F
112	US00000214-0215	Feb. 25, 2019	Email from Cooper Strickland to Edward Smith	None
113	US00000279-0280	Feb. 6, 2019	Email from Caryn Strickland to Edward Smith	Cond.; 106 (does not include attachment)
114	US00000325	Mar. 11, 2019	Email from Edward Smith to Caryn Strickland	Cond.; 403; 602; 701; 801/802; F
115	US00000388-0389	Jan. 9, 2019	Email from William Moormann to Heather Beam	Cond.; 403; 602; 701; 801/802; 901; 1001-1004; F
116	US00000462	Aug. 22, 2018	Email from Heather Beam to Caryn Strickland	Cond.; 801/802
117	US00000483-0484	Mar. 4 - June 12, 2019	Emails between James Ishida and Alison Rushing	Cond.; 801/802; 901; F

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118	US00000608-0610	June 12, 2019	Emails between James Ishida and Anthony Martinez	Cond.; 403; 602; 701; 801/802; 901; F
120	US00001149	Aug. 22, 2018	Emails between Nancy Dunham and Caryn Strickland	Cond.; 403; 801/802; F
121	US00001339	Feb. 26, 2019	Email from Edward Smith to James Ishida	Cond.; 801/802; 901; F
122	US00001386	Oct. 9, 2018	Email from James Ishida to Caryn Strickland Strickland	Cond.; 106 (does not include attachment); 801/802; F
123	US00001389-1395	Oct. 9, 2018	Email from James Ishida to Caryn Strickland	Cond.; 106 (attachments not included); 602; 701; 801/802; F
124	US00001396-1401	Sept. 28, 2018	Email from James Ishida to Caryn Strickland	Cond.; 106 (attachments not included); 602; 701; 801/802; E; F
125	US00001417	Sept. 18, 2018	Email from James Ishida to Heather Beam	Cond.; 801/802; 901; F
126	US00006380	June 6, 2018	Texts between J.P. Davis and Erin Taylor	Cond.; 106 (does not include full text message chain); 403; 602; 701; 801/802; 901; F; potentially privileged
127	US00005445		Notes written by Jill Langley about her Feb. 14, 2019 conversation with Caryn Strickland	Cond.; 403; 602; 701; 801/802; 901; E; F
128	US00004715	July 25, 2018	Email from Josh Carpenter to Anthony Martinez, J.P. Davis, William Moormann, Peter Adolf, Erin Taylor, and Holly Dixon	Cond.; 106 (attachment not included); 403; 602; 701; 801/802; 1001-1004; F
129	PLTF0033-34	July 25, 2018	Caryn Strickland's handwritten notes	Cond.; 106 (does not include full set of notes); 403; 404/405, 608/609; 801/802; F
130	PLTF00365-66	Aug. 22, 2018	Emails exchanged between Caryn Strickland and Nancy Dunham	Cond.; 403; 801/802; 1001-1004; F; UT
131	PLTF004643	June 2018	Texts between Caryn Strickland and Jeff King	Cond.; 106; 403; 404/405; 608/609; 801/802; 1001-1004; UT
132	PLTF00744-745	July 2, 2018	Caryn Strickland's handwritten notes	Cond.; 106; 403; 404/405, 608/609; 801/802; 1001-1004; F; UT
133	PLTF00750-56	July 8, 2018	Caryn Strickland's handwritten notes	Cond.; 106; 403; 404/405, 608/609; 801/802; 1001-1004; F; UT

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Ex. No.	Bates Number	Date	Description of Exhibits	Objection(s)
134	US00000352	Nov. 21, 2018	Email from Caryn Strickland to Heather Beam	Cond.; 801/802; F
135	US00006348-6356	May 24, 2018	Texts between Erin Taylor and J.P. Davis	Cond.; 106 (does not include full text message chain); 402; 403; 602; 701; 801/802; 901; F; potentially privileged
136	US00006362	June 5, 2018	Text from J.P. Davis to Anthony Martinez	Cond.; 402; 403; 602; 801/802; 901; F; potentially privileged
137	US00006640	May 29, 2018	Texts between J.P. Davis and Anthony Martinez	Cond.; 106 (does not include full text message chain); 402; 403; 602; 701; 801/802; 901; F; potentially privileged
138	US00002784	Aug. 16, 2018	Request to Reclassify an Employee for Caryn Strickland	Cond.; 602; 701; 801/802; 901; F
139	US00002785	Aug. 16, 2018	Request to Reclassify an Employee for Jared Martin	Cond.; 602; 701; 801/802; 901; F
140	US00003466-3467	Aug. 16, 2018	Emails between William Moormann and Tim Lavan	Cond.; 106 (does not include attachments); 602; 701; 801/802; 901; F
138		Aug. 9, 2018	180809_1344 - audio file of recorded conversation between Anthony Martinez and Caryn Strickland	Cond.; 106 (should include transcript); 403, 404/405; 608/609; 602; 701; 801/802; 1001-1004; Because Defendants did not identify which portion(s) they intend to introduce, Plaintiff lacks reasonable notice of this exhibit.
139		Sept. 13, 2018	180913 1633 - audio file of recorded conversation between Amaal Scroggins and Caryn Strickland	Cond.; 106 (should include transcript); 403, 404/405; 608/609; 801/802; 602; 701; 1001-1004; Because Defendants did not identify which portion(s) they intend to introduce, Plaintiff lacks reasonable notice of this exhibit.

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140		Jan. 17, 2019	190117_1621_Limited Confidentiality - audio file of recorded conversation between Caryn Strickland and James Ishida	Cond.; 106 (should include transcript); 403, 404/405; 608/609; 602; 701; 801/802; 1001-1004; Because Defendants did not identify which portion(s) they intend to introduce, Plaintiff lacks reasonable notice of this exhibit.
141		Feb. 7, 2019	190207_1056_Limited Confidentiality - audio file of recorded conversation between Caryn Strickland and Edward Smith	Cond.; 106 (should include transcript); 403, 404/405; 608/609; 602; 701; 801/802; 1001-1004; Because Defendants did not identify which portion(s) they intend to introduce, Plaintiff lacks reasonable notice of this exhibit.
142		Feb. 26, 2019	190226_1153 - audio file of recorded conversation between Caryn Strickland and Edward Smith	Cond.; 106 (should include transcript prepared by Defendants); 403, 404/405; 608/609; 602; 701; 801/802; 1001-1004; Because Defendants did not identify which portion(s) they intend to introduce, Plaintiff lacks reasonable notice of this exhibit.
143		Mar. 9, 2019	190308_1019 - audio file of recorded conversation between Caryn Strickland and Edward Smith	Cond.; 106 (should include transcript prepared by Defendants); 403, 404/405; 608/609; 602; 701; 801/802; 1001-1004; Because Defendants did not identify which portion(s) they intend to introduce, Plaintiff lacks reasonable notice of this exhibit.

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144		Sept. 5, 2018	180905_1042 - audio file of recorded conversation between Caryn Strickland and James Ishida	Cond.; 106 (should include transcript prepared by Defendants); 403, 404/405; 608/609; 602; 701; 801/802; 1001-1004; Because Defendants did not identify which portion(s) they intend to introduce, Plaintiff lacks reasonable notice of this exhibit.
145		Feb. 12, 2018	190212_1848 - audio file of recorded conversation between Caryn Strickland and Edward Smith	Cond.; 106 (should include transcript prepared by Defendants); 403, 404/405; 608/609; 602; 701; 801/802; 1001-1004; Because Defendants did not identify which portion(s) they intend to introduce, Plaintiff lacks reasonable notice of this exhibit.
146		June 1, 2023	Expert report of Paul F. White	Cond.; 402 (should be excluded to the extent it includes opinions about mitigation, which is not a defense in this case); 403; 602; 701; 702-704; 801/802; 901; 1001-1004; E; F
147		May 30, 2023	Expert report of Robert W. Jackson	Cond.; 402 (should be excluded because it relates entirely to mitigation, which is not a defense in this case); 403; 602; 701; 702-704 801/802; 901; 1001-1004; E; F

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148		April 7, 2023	Plaintiff's Supplemental Privilege Log	Cond.; 402; 403; 801/802; 404/405, 608/609; 611. Should be excluded because no after-acquired evidence defense pleaded in this case, and not admissible for any other purpose.
149		April 7, 2023	Plaintiff's Recordings Privilege Log	Cond.; 402; 403; 801/802; 404/405, 608/609; 611. Should be excluded because no after-acquired evidence defense pleaded in this case, and not admissible for any other purpose.